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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff

v.

SERHAT DANIEL GUMRUKCU,

Defendant.

Case No. 22-MJ-02075

**RESPONSE CORRECTING
ERRONEOUS
REPRESENTATIONS IN
DEFENDANT'S MOTION FOR
BOND [DOC. 8]**

Hearing Date: June 15, 2022
Hearing Time: 1:00pm

Third-Party Paul Dougherty hereby files this response to correct erroneous representations made by Defendant SERHAT GUMRUKCO in his Motion for Bond Pending Trial [Doc. 8]. Defendant has unfortunately declined to correct the errors in the record when requested to do so by Mr. Dougherty.

In truth, Paul Dougherty was not willing to act as a surety or post his home to secure Defendant's release as claimed in Defendant's Motion for Bond Pending Trial (the "Motion"). Doc. 8 at 19. More specifically, Dougherty, through his counsel, specifically advised Defendant's counsel *prior* to the filing of the Motion that Dougherty had decided against serving as a surety despite initially considering the request for help. Dougherty,

1 after learning of the full scope of the allegations and charges against Defendant, realized
2 there were a number of potentially significant circumstances of which he had not been
3 previously aware.

4 Even after being advised that Dougherty had declined to serve as a surety or post
5 his home, Defendant filed his Motion erroneously representing to the Court that Mr.
6 Dougherty was prepared to do so. While leaving this representation in the final version of
7 the Motion appears to have been a drafting error by Defense counsel's office, Defendant
8 has refused to advise the Court of this prior error or to correct the public record, when
9 requested to do so by Mr. Dougherty. Correcting the record and alerting the Court to an
10 inaccurate representation previously made could have been accomplished either in a two-
11 sentence notice or even in a brief footnote in any subsequent filing related to the upcoming
12 bail hearing.

13 As a result, Mr. Dougherty files this response to correct the public record.

14
15 Respectfully submitted,

16 BRAUN & BRAUN LLP

17
18 Dated: June 14, 2022

By: /s/ Adam H. Braun

Adam H. Braun

Attorneys for Third-Party

Paul Dougherty